

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION – DETROIT**

IN THE MATTER OF:
Douglas L. Dennis, Debtor(s).

CHAPTER 13
CASE NO. 19-44634-MLO
/ JUDGE MARIA L. OXHOLM

**TRUSTEE'S OBJECTIONS TO
CONFIRMATION OF CHAPTER 13 PLAN**

NOW COMES, the Chapter 13 Trustee, Tammy L. Terry, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E.D. Mich. L.B.R. 3015-3(a) and 11 U.S.C. §1307(c)(5) as follows:

1. As of today, the Trustee has not received a true copy of the debtor's **Payment Order**, or an Electronic Transfer of Funds Payment Order, in contravention of E.D. Mich. L.B.R. 1007-1(c).

2. A review of the Debtors Schedule I indicates a 401k loan in the monthly amount of \$50.00. The Trustee requests the Debtor provide the specific date upon which this obligation will be paid in full. To the extent that this obligation will be paid in full during the pendency of the Chapter 13 case, the Trustee requests that best efforts be increased by the amount of the 401k loan payment in the month immediately following the month in which the obligation is paid in full.

3. The Trustee requests that the debtors provide documentation seven (7) days prior to Confirmation that evidences that the debtor has paid all amounts required under a Domestic Support Obligation since the date of filing the Petition, pursuant to 11 U.S.C. §1325(a)(8).

4. The Trustee requests that the debtor provide copies of three (3) post-petition pay stubs at least 14 days prior to confirmation.

5. The value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate of the debtor(s) were liquidated under Chapter 7, contrary to 11 U.S.C. 1325(a)(4).

6. The Trustee objects to the debtor's (s) **failure to provide complete information** regarding the name, address and telephone number of the child support or alimony enforcement agency or agencies and the custodial parent(s). The Trustee is unable to comply with the requirement of 11 U.S.C. § 1302(d) without this information. The Trustee requests that the debtor (s) provide this information within seven (7) days.

7. The debtor testified at the §341 First Meeting of Creditors that he believes that a 2007 Yamaha motorcycle and a 2008 Pontiac G-6 are still titled in his name. The Trustee objects to the debtor's failure to disclose this property in Schedule A/B and list in Schedule C and the Trustee requests an amendment of same.

WHEREFORE, the Chapter 13 Trustee requests this Honorable Court deny confirmation of the debtor's (s') Chapter 13 Plan and dismiss this case pursuant to 11 U.S.C. §1307(c)(5).

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Tammy L. Terry, Chapter 13 Trustee

May 14 , 2019

/s/ Tammy L. Terry *KS*

TAMMY L. TERRY (P-46254)

Chapter 13 Standing Trustee

/s/ KIMBERLY SHORTER - SIEBERT (P-49608)

/s/ MARILYN R. SOMERS-KANTZER (P-52488)

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CERTIFICATE OF MAILING

I hereby certify that on May 16, 2019, a copy of **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** was electronically filed with the Clerk of Court, served electronically to the debtor's(s') attorney and a copy of same deposited in the U. S. Mail to the debtor (s) at the address as it appears below.

/s/ Patrice N. Watson

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